



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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September 27, 2002

VIA EMAIL AND U.S. MAIL

Bruce P. Beausejour, Esq.
Victor D. Del Vecchio, Esq.
Verizon Massachusetts
185 Franklin Street, Room 1403
Boston, MA 02110

Re: D.T.E. 01-31-Phase II (Track B)
D.T.E.'s Third Set of Information Requests

Dear Messrs. Beausejour and Del Vecchio:

Enclosed please find the third set of questions to Verizon Massachusetts issued by the Department in the above-captioned matter. Please submit Verizon's responses to the Department and the parties in hard copy and by email on or before 5:00 p.m., Monday, October 7, 2002. Should you have any questions, please contact me at (617) 305-3608.

Sincerely,

Paula Foley
Hearing Officer

Encs.

cc: DTE 01-31-Phase II service list (w/encs.)

INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon Massachusetts the following Information Requests.

Instructions

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, and on all Department staff and parties; and submit two (2) copies of the responses to Paula Foley, Hearing Officer.

QUESTIONS TO VERIZON MASSACHUSETTS

D.T.E. 01-31-Phase II (Track B)

September 27, 2002

1. Please refer to DTE-VZ 1-1, Attachments: For each Residence Basic Service listed, please indicate the UNEs Required to Provide Service along with the corresponding UNE rate from MDTE Tariff No. 17. In addition, please calculate the total of the UNE rates for each Residence Basic Service.
2. Please specify the dial-tone rate increase necessary for a revenue-neutral adjustment of Verizon MA's rates if switched access termination rates are reduced to the UNE rate for local termination.
3. Please specify the dial-tone rate increase necessary for a revenue-neutral adjustment of Verizon MA's rates if Eastern LATA toll rates are reduced to Western LATA levels.
4. Assuming the existing demand for intrastate special access, please specify the dial-tone rate increase necessary for a revenue-neutral adjustment of Verizon MA's rates if intrastate special access rates are reduced to UNE-based levels. Please provide all supporting workpapers.
5. Please refer to Verizon's Reply Comments of July 17, 2002, at p.11: Regarding the reduction of intrastate special access rates to UNE-based levels, Verizon MA states, "[t]his would conflict with both Department and FCC policies and could seriously erode Verizon MA's over \$350 million in Interstate Special Access Revenues."
 - a. Please identify and explain which FCC and Department policies are being referred to in this statement.
 - b. Please explain which FCC or Department rules determine when special access is ordered out of the FCC or Department tariff.
 - c. Please explain any Verizon MA policies or practices that determine whether special access is ordered out of the FCC or Department tariff.
6. Please explain whether, and to what extent, the proposed Service Quality Plan could be modified to reflect measurements for the level of service provided to Verizon MA's residential customers only.
7. The Service Quality Plan in D.P.U. 94-50 included a penalty provision that required an increase in the productivity offset of one-twelfth of one percent if certain service levels were not met. In this proceeding, Verizon MA proposes a Service Quality Plan that includes a penalty of one-twelfth of one percent of annual retail revenue for every month that either the overall performance level is less than 33 points or if three or more

of the twelve individual service items fall below the standard threshold on a statewide basis in a given month. Is Verizon MA able to show that the proposed penalty, on a dollar basis, would be equivalent to the penalty provision included in the D.P.U. 94-50 Service Quality Plan?

8. If the imposition of a retail Service Quality Plan were eliminated, what would be the impact, if any, on the Performance Assurance Plan and the Consolidated Arbitrations performance standards and reporting?